ICC Docket No. 01-0662 Ameritech Illinois Ex. 4.1 (Cottrell) Schedule – 2/Part 5

### STATE OF MICHIGAN

### BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,	)	
to consider Ameritech Michigan's compliance	)	
with the competitive checklist in Section 271 of	)	Case No. U-12320
the federal Telecommunications Act of 1996.	)	
	)	

# SBC AMERITECH MICHIGAN'S SUPPLEMENTAL REPORT ON THE LINE LOSS NOTIFICATION ISSUE

Michigan Bell Telephone Company, d/b/a SBC Ameritech Michigan (hereafter "SBC"), respectfully submits this supplemental filing to provide the Commission and the parties to this docket with further information regarding the current status of SBC's continuing investigation into this issue, as well as to provide an update as to the actions SBC stated it would take in its January 29, 2002 filing herein. As previously stated, SBC takes this matter very seriously and will continue to update the Commission with its progress until this issue has been resolved. SBC commits to filing a supplemental update on this issue no later than April 1, 2002.

# I. UPDATE ON ACTIONS DESCRIBED IN JANUARY 29, 2002 FILING

As indicated in the SBC filing dated January 29, 2002, to allow the CLECs adequate time to prepare to receive the line loss notifiers, all identified missing line loss notifiers were electronically generated to each CLEC via normal OSS channels during the weekend of

February 2-3, 2002. Any line loss notifiers that fell out of the system and could not be properly generated were investigated and subsequently generated during the week of February 4, 2002.

### A. Accuracy of data in CLEC User Profile in MOR/TEL

SBC did undertake an audit that compared the CLEC's completed questionnaire to what was stored in the CLEC's user profile. As of February 22, 2002, fifteen potential discrepancies were found. The CLEC user profile table contains data for 248 CLECs. Therefore, only 6 percent contained potential discrepancies. Of these potential discrepancies, all are currently being discussed by the SBC account managers with the applicable CLECs to determine whether they do or do not want to receive the line loss notifiers. These discussions and subsequent updates (if necessary) should be completed by March 15, 2002.

### **B.** Partial Migrations

As indicated in the January 29, 2002 report, the cross-functional team identified an issue with the following order scenario: (1) a Change ("C") Order to update CLEC A's account to reflect that it now had 7 lines (not 10), and (2) a New ("N") Order to establish CLEC B's account with the 3 lines the end user decided to migrate. The team determined that the "C" Order may not contain all the necessary "losing" information that would allow MOR/Tel to identify the need for and generate a line loss notification to the losing CLEC using its current logic. The new system logic now looks to compare whether the owner of the account (CLEC A) is the same as the submitter of the order (CLEC B) and determine if a line loss notifier is required. This system update was completed during the weekend of February 2-3, 2002.

Another issue had also been identified with the following order scenario: (1) a Disconnect ("D") Order would be issued to take out the 10 line account for CLEC A, and (2) an "N" Order would be issued to re-establish the 7-line account for CLEC A, and (3) another "N" Order would be issued to establish the 3-line account for CLEC B. The sub-team was formed to determine: (a) the proper process, (b) the systems requirements for that process, (c) any needed changes to systems, (d) any needed updates to internal documentation, and (e) any needed updates to external documentation, to ensure the requirements are properly implemented. The sub-team did determine that a process change, documentation changes, and system changes were required. The process change will be to implement the following order scenario: (1) "C" Order including both outward action (for the 3 lines migrating) and Change and Transfer (or "C&T") Order action (restructure the CLEC A's account for the 7 lines staying), and (2) "N" Order to establish CLEC B's account with the 3 lines the end user decided to migrate. The current MOR/Tel line loss notification logic will need to be changed to not only look at the "outward" action but also the "C" action code as a loss. The logic will also compare the "T" action code with any outward activity to suppress the "TN" as a loss. This will then provide only the losing lines (3 in this example) on the line loss notification versus all lines (10 in this example). A change request for MOR/Tel system change is being finalized and will be scheduled per an expedited request.

### **C.** Issue 7 UNE-P Migrations

Another issue identified in the January 29, 2002 report involved UNE-P to UNE-P migrations. In this ordering scenario, multiple service orders are used in making the change as follows: (1) a "D" Order (full migration) or "C" Order (partial migration) is issued to remove the

line(s) from CLEC A's account, and (2) an "N" Order is issued to establish the line(s) on CLEC B's account. The order number of the order that first processed through SBC's systems to MOR/Tel (either the "D/C" or the "N") was the one used to populate the service order number on the line loss notifier. Thus, if the "N" Order processed first, the losing CLEC (CLEC A) would receive a line loss notifier containing an "N" order number. This likely was confusing to the losing CLEC since a "D" or "C" Order number would be expected to be included on the line loss notifier. However, the telephone numbers included were accurate. Initially, it was believed that, since the telephone numbers being reported on the line loss notifiers sent were correct and Issue 7 was close to retirement, changes were not appropriate to make a correction. Upon subsequent review, however, SBC determined this change could be implemented without expending inappropriate resources given the Issue 7 remaining life. This change was completed on February 9, 2002, and this problem has now been corrected by providing the appropriate "C" or "D" order number for Issue 7 EDI 836 transactions.

# II. TO-DATE RESULTS OF CROSS-FUNCTIONAL INVESTIGATION

As previously stated, SBC established a cross-functional team to analyze the line loss notification process on a continuous basis to ensure loss notifications are correct and complete and that any defects noted in the process are corrected for the future. This team and its mission have been described since SBC's initial filing in December 2001 and, as shown below, have been continuously refined and improved to ensure this important issue is fully addressed.

### A. Cross-Functional Team

The cross-functional team is being managed with regular meetings and conference calls, even on a daily basis. The team's charge is to examine daily transactions, identify error conditions, and correct those error conditions, where possible. Four sub-teams have been formed as follows:

- Oversight Team
- Analysis Team
- Re-flow Team
- Resolution Team

These teams have created three reports that are being used daily in their investigation process as follows:

- The "Catch-All Report", which is intended to ensure commonly known errors made by service representatives are identified and corrected.
- The "Happy Report", which is intended to identify all Purchase Order Numbers that have been successfully processed by the program logic.
- The "Unhappy Report", which is intended to identify situations where a Purchase Order Number may have not been successfully processed by the program logic.

The Catch-All and Unhappy Reports are reviewed in detail on a daily basis. Identified errors are categorized, and any new issues with the process are documented. Errors are communicated to the Re-flow Team to be corrected, and the corrected information is sent to the CLECs. Errors are referred to the Resolution Team to determine and coordinate implementation of corrections to prevent future occurrence. The Happy Report is reviewed on a sample basis. Any errors found are referred to the Resolution Team. The results of this intensified scrutiny indicate that all line loss notifiers identified on the Unhappy Report and the

Catch-All Report are being sent to the CLECs within a four-day timeframe following the effective date of the loss.

### **B.** Cross-Functional Team Continuing Actions

One additional ordering scenario has been identified relating to migration from one CLEC to another CLEC using different products ("segments"). For example, if CLEC A had a resale account and CLEC B decided upon migration to provide service via UNE-Loop (facilities-based), this triggered a unique Segment "S" Order to be created for MOR/Tel. It was determined this "S" Order should have been the trigger in MOR/Tel to generate a line loss notifier. However, the process is not working as intended. The team has determined that this ordering scenario required further examination to ensure that the processes defined are the most efficient and appropriate to make the required changes and generate the line loss notifier (when necessary). This review is underway and will be reported on in SBC's next update report.

The cross-functional team effort is continuing and will remain in place until the issue of ensuring proper, timely, accurate generation of line loss notifiers is resolved. All of the sub-teams and reports discussed above are still actively focused on daily activities to ensure any missing line loss notifiers are appropriately investigated and corrected. An update of further findings and resolutions will be made to the Commission by April 1, 2002.

# III. RESPONSES TO WORLDCOM AND Z-TEL JANUARY 24, 2002 SUBMISSIONS

Both WorldCom and Z-Tel responded to SBC's January 9, 2002 report. SBC carefully reviewed the filed comments and provided a response on February 8, 2002. The

account management teams continue to work with WorldCom and Z-Tel to resolve any specific issues they identify.

#### IV. ADDITIONAL ACTIVITIES

Additional activities include the following:

- SBC will host a Loss Notification Workshop on March 13-14, 2002 in Hoffman Estates, Illinois. This workshop is being held to discuss loss notifications, the current processes, planned enhancements and areas for improvement. Flow charts of the existing process will be distributed by March 8, 2002. An Accessible Letter CLECAM02-077 was provided to the CLECs on February 27, 2002 advising them of this workshop and that any issues or concerns regarding loss notifications could be sent in advance. A copy of this letter is attached hereto.
- SBC account management teams are continuing to work closely with individual CLECs to identify and resolve any specific concerns.

### V. CONCLUSION

SBC reiterates that it fully recognizes the importance of accurate and timely line loss notifications. SBC is currently dedicating all necessary resources to address this issue. This intensified effort will continue until the line loss notifier process is working as it should. Beyond that, the process will be monitored to ensure continued accuracy. SBC renews its commitment to provide updated information to the Commission and to the affected CLECs on its continuing efforts to completely resolve any identified problems with line loss notifications.

Respectfully Submitted,

Craig A. Anderson (P28968) AMERITECH MICHIGAN 444 Michigan Avenue, Room 1750 Detroit, Michigan 48226 (313) 223-8033

DICKINSON WRIGHT PLLC

By:

John M. Dempsey (P30987) Attorneys for Ameritech Michigan 215 S. Washington Square, Suite 200 Lansing, MI 48933-1816 (517) 371-1730

Dated: February 28, 2002

LANSING 34060-104 293608





Date: February 27, 2002 Number: CLECAM02-077

Effective Date: NA Category: All

Subject: (MEETING) Loss Notification Workshop

Related Letters: NA

States Impacted: Ameritech Region

Response Deadline: NA Contact: CLEC User Forum mailbox at

sbccuf@msq.pacbell.com

Conference Call/Meeting: Workshop

Date/Time: March 13 and 14, 2002 Bridge:

8:30am - 5pm Central Time

RSVP to: sbccuf@msg.pacbell.com By: March 8, 2002

SBC Ameritech will host a workshop to discuss Loss Notifications, the current processes, planned enhancements and areas for improvement. Flow charts of the existing process will be distributed by March 8<sup>th</sup>.

While the focus of the workshop will be on Line Loss Notifications, there will be opportunity to discuss provisioning issues.

Issues and concerns regarding Loss Notifications and/or provisioning issues can be sent to the CLEC User Forum mailbox at <a href="mailto:sbccuf@msq.pacbell.com">sbccuf@msq.pacbell.com</a> through March 6<sup>th</sup>.

The Workshop will be held at Ameritech's facility in Hoffman Estates Illinois. If your company wishes to participate, **please RSVP by March 8, 2002**. Please provide the following for each attendee:

- Name
- Company Name
- Phone Number
- Email address

Access to the building is restricted and a list of confirmed attendees will be provided to Security the day of the meeting. It is important that you confirm your attendance in advance to avoid delays in entering the building.

An agenda and meeting room logistics will be distributed with the flow charts by March 8<sup>th</sup>.





Date: March 6, 2002 Number: CLECAM02-089

Effective Date: **Immediately** Category: **All** 

Subject: SBC Ameritech Line Loss Notification

Related Letters: NA Attachment: Yes

States Impacted: Ameritech

Response Deadline: NA Contact: Account Manager

Conference Call/Meeting: NA

This Accessible Letter process is being used in this instance solely because it is an established and efficient method of communicating to the CLEC community a retail policy change for the Ameritech states which does not directly impact CLEC processes.

SBC reiterates that it fully recognizes the importance of accurate and timely line loss notifications. SBC is currently dedicating all necessary resources to address this issue. This intensified effort will continue until the line loss notifier process is working as it should. Beyond that, the process will be monitored to ensure continued accuracy. SBC renews its commitment to provide updated information to the CLECs on its continuing efforts to completely resolve any identified problems with line loss notifications. In the interim as a result of the ICC Order in Docket No. 02-0160, Ameritech is modifying its retail "Winback" process to delay the start of any "Winback" activity for 15 days following the completion of the order migrating the customer to another local service provider. SBC has decided to make this modification applicable to all CLECs in the five Ameritech states and is effective immediately.



March 8, 2002

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**Via Hand Delivery** 

Dorothy Wideman Executive Secretary Michigan Public Service Commission 6545 Mercantile Way Lansing, MI 48909

Re: In the matter, on the Commission's own motion, to consider AMERITECH MICHIGAN'S compliance with the competitive checklist in Section 271 of the federal Telecommunications Act of 1996.

Case No. U-12320

Dear Ms. Wideman:

Please find enclosed for filing an original and 15 copies of the following documents:

- SBC Ameritech Michigan's Reply to Z-Tel's March 4, 2002 Filing On Line Loss Notification
- Proof of Service

If you should have any questions, please contact me. Thank you.

Very truly yours,

John M. Dempsey

John M. Jampson

JMD/mds Enclosures

cc: Parties of Record

#### STATE OF MICHIGAN

#### BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,	)	
to consider Ameritech Michigan's compliance	)	
with the competitive checklist in Section 271 of	)	Case No. U-12320
the federal Telecommunications Act of 1996.	)	
	)	

## SBC AMERITECH MICHIGAN'S REPLY TO Z-TEL'S MARCH 4, 2002 FILING ON LINE LOSS NOTIFICATION

Michigan Bell Telephone Company, d/b/a SBC Ameritech Michigan (hereafter "SBC"), submits the following reply to the March 4, 2002 filing of Z-Tel's Supplemental Filing With Respect to Line Loss Issue ("Z-Tel Filing").

SBC has clearly stated that it takes the issue very seriously and has undertaken a variety of steps to rectify problems and address all issues concerning the accuracy and timeliness of the generation of line loss notifications. On March 6, 2002, SBC issued an Accessible Letter, attached hereto as Exhibit A, which advises CLECs that SBC is voluntarily modifying its retail Winback process in Michigan and three other SBC Ameritech states to delay, on an interim basis, the start of activity for a period of 15 days following the loss of a customer.

This voluntary commitment in Michigan addresses one (the third on page 2) of the items of relief sought in the Z-Tel Filing.

With respect to the other requested relief, SBC responds as follows. As to the first two listed items (full accounting of its customers and review of billed amounts), SBC continues to work with Z-Tel on a "business to business" basis to address these issues. As noted in its February 8 response to Z-Tel (and WorldCom), this method is the most productive in resolving

these CLEC-specific issues. SBC will address the fourth item (requested quantification of the line loss notification issue impact) in its planned April 1 update on this issue, when it will have had the opportunity to investigate and determine what information is available to report.

Respectfully Submitted,

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Dated: March 8, 2002

LANSING 34060-104 294012

### STATE OF MICHIGAN

### BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,	)	
to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of	)	Case No. U-12320
the federal Telecommunications Act of 1996.	)	

### **PROOF OF SERVICE**

STATE OF MICHIGAN	)
	) ss
COUNTY OF INGHAM	)

Alicia M. Ball, being first duly sworn, deposes and says she is employed at Dickinson Wright PLLC; and that on March 8, 2002, she served a copy of *SBC Ameritech Michigan's Reply to Z-Tel's March 4, 2002 Filing On Line Loss Notification* upon the attached service list via email and first class mail by depositing the same in a United States postal depository, enclosed in an envelope, bearing postage fully prepaid in Lansing, Michigan.

Alicia M. Ball

Subscribed and sworn to before me, a Notary Public in and for said County, this 8th day of March, 2002.

Deann Baillargeon

Deann Baillargeon, Notary Public Ingham County, Michigan

My Commission Expires: 2/16/03

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